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September 20, 1995

Office of the Secretary
Federal Communications Commission
Washington, DC. 20554

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FCC MAIL ROOM

Dear Secretary

Enclosed you will find a filing In the Matter of: Amendment of Part 95 of the Commission's Rules to Establish a Very Short Distance Two-Way Voice Radio Service, WT Docket 95-102

There are one signed original and eleven copies for distribution to the Commissioners.

Yours truly



Kerry D. Cochran

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Before the
Federal Communications Commission
Washington, DC. 20554

In the Matter of)

Amendment of Part 95 of the)

Commission's Rules to)

Establish a Very Short Distance)

Two-Way Voice Radio Service)

WT Docket 95-102

Comments to a Notice of Proposed Rule Making
(RM-8499)

Filed by: Name: Kerry Cochran
Address: P.O. Box 911
San Bruno, Ca. 94066

GMRS Callsign: KAD8667

Signed:



Date:

7/20/91

Federal Communications Commission

My name is Kerry Cochran, I am a licensed GMRS (General Mobile Radio Service) user and operator. I have been using Radio Systems for over twenty years. I have been involved with several types of communications services, using both radio and land wire services. I have been using GMRS for over ten years. (GMRS callsign KAD 8667)

I have serious concerns over the current NPRM RM-8499, WT-Docket 95-102, FRS (Family Radio Service) proposal.

I object to this FRS proposal, as it would impact my operations through a repeater, that I and several other GMRS users, use. I **Strongly** object to the FRS using any of the 467 Mhz GMRS spectrum for this proposed new operation. As with the current GMRS interstitial frequencies that overlap at present, the overlapping of frequencies will seriously interfere with the operation of my current GMRS repeater system.

I highly object to the unlicensed operations of the GMRS spectrum and to this proposed FRS unlicensed operation.

I have had several unlicensed users and person(s) who Fail to identify themselves by their FCC assigned call sign.

I have been inundated with interference from unlicensed person(s) in my area to the last two years, and this has caused a great deal of trouble. This proposal would only add to this situation.

This unlicensed FRS proposal would just bring a "CB" (Citizens Band 27 Mhz) type of unlicensed users to a spectrum that is now licensed. At lease with the present GMRS licensing we can identify person(s) causing harmful interference and get it corrected or stopped.

It has been show in the news media that the FCC is going out of the Interference business and may even have private person(s) or companies try to assist the public with interference complaints. This unlicensed radio service would only add to this problem

The FCC staff has recently stated that they will soon reduce all enforcement action on all bands and cease enforcement on Citizens Band Radio.

This new radio service (FRS) would then become an unlicensed, un-enforced, and out of control type of operation.

I strongly oppose this type of unlicensed operation.

This type of radio service is uncalled for. If person(s) want to use a unlicensed, low powered means of communication, that is what "CB" (Citizens Band 27Mhz) spectrum is designed for.

The GMRS (General Mobile Radio Service) should retain its very small portion of the 462/467 Mhz spectrum and have primary status over any other new radio service.

There are other spectrum alternatives available for a "very short range" personal radio service.

Voice communications using inexpensive mass-produced radios with digital technology could be located in higher frequency "Part 15" bands where there would be minimal or no interference to existing users and where unlicensed operations are already permitted.

This is where FRS belongs, (Part 15) not in the GMRS spectrum (Part 95).

I believe that the FCC has ignored a number of vigorous complaints by individual GMRS users and their comments on the early Tandy proposal.

GMRS users documented prior FCC refusals to mix licensed and unlicensed services, and describe other technical problems with the FRS request that would substantially disrupt current and future GMRS operations.

These comments were filed opposing petition RM-8489. GMRS users unanimously oppose delicenseing GMRS spectrum, including creating a new unlicensed radio service on GMRS channels.

I demand that this FRS proposal be **REJECTED**, and **NOT** be approved.

Sincerely

A handwritten signature in black ink, appearing to read "Kerry D. Cochran", with a long horizontal flourish extending to the right.

Kerry D. Cochran
KAD8667